

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____

v. : DATE FILED: _____

JUAN JOSE ADORNO, : VIOLATION: 21 U.S.C. § 846
MAYRA MOLINA, (Conspiracy to possess
JESSICA RIVERA with intent to distribute
heroin - 1 count)
21 U.S.C. § 841(a)(1)
(Possession with intent to
distribute heroin - 1 count)
18 U.S.C. § 2
(Aiding and abetting)
21 U.S.C. § 853
(Notice of Forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about June 3, 2003, to on or about June 4, 2003, at Allentown,
Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, defendants

**JUAN JOSE ADORNO,
MAYRA MOLINA, and
JESSICA RIVERA,**

conspired and agreed, together and with others known and unknown to the grand jury, to
knowingly and intentionally possess with intent to distribute over 100 grams, that is,
approximately 139.5 grams, of a mixture or substance containing heroin, a Schedule I controlled
substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

MANNER AND MEANS

1. It was part of the conspiracy that defendants JUAN JOSE ADORNO, MAYRA MOLINA, and JESSICA RIVERA possessed with intent to distribute approximately 139.5 grams of heroin in Allentown, in the Eastern District of Pennsylvania, and elsewhere.

It was further a part of the conspiracy that:

2. Defendant JUAN JOSE ADORNO contacted his heroin supplier in New York City and made arrangements for defendants MAYRA MOLINA and JESSICA RIVERA to travel to New York City, to carry currency with them to pay for the heroin, and to transport the heroin to Allentown, Pennsylvania according to ADORNO's instructions.

3. Defendant JUAN JOSE ADORNO paid defendants MAYRA MOLINA and JESSICA RIVERA to transport the heroin.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were performed by the defendants in the Eastern District of Pennsylvania, and elsewhere:

1. On or before June 3, 2003, defendant JUAN JOSE ADORNO contacted a heroin supplier in New York City and arranged to purchase approximately 139.5 grams of heroin for \$6,000.

2. On or about June 3, 2003, defendant JUAN JOSE ADORNO met with defendants MAYRA MOLINA and JESSICA RIVERA, and another person known to the grand jury, in Allentown, Pennsylvania, and instructed defendants MOLINA and RIVERA to take money to ADORNO's heroin supplier in New York City, and to transport a quantity of heroin

from New York to Allentown, Pennsylvania. Defendant ADORNO promised to pay defendants MOLINA and RIVERA for transporting the heroin.

3. On or about June 3, 2003, defendants MAYRA MOLINA and JESSICA RIVERA traveled from Allentown, in the Eastern District of Pennsylvania, to New York City, and met with defendant JUAN JOSE ADORNO's heroin supplier. Defendants MOLINA and RIVERA exchanged money for two packages that they knew contained heroin, and transported the heroin to Allentown on the same day, as instructed by defendant ADORNO.

4. On or about June 3, 2003, the defendants MAYRA MOLINA and JESSICA RIVERA each concealed a quantity of heroin on her person, and possessed the heroin with intent to bring it to defendant JUAN JOSE ADORNO for distribution.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 3, 2003, at Allentown, in the Eastern District of Pennsylvania,
and elsewhere, defendants

**JUAN JOSE ADORNO,
MAYRA MOLINA, and
JESSICA RIVERA**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute of, in excess of 100 grams, that is, approximately 139.5 grams,
of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled
substance,

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B),
and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Counts One and Two of this indictment, defendants

**JUAN JOSE ADORNO,
MAYRA MOLINA, and
JESSICA RIVERA**

shall forfeit to the United States of America, the following property:

- A. All property derived from any proceeds which defendant **JUAN JOSE ADORNO** obtained directly or indirectly, as a result of the violations of Title 21 as charged in this indictment.
- B. All property owned by **JUAN JOSE ADORNO** which was used or intended to be used in any manner or part to commit or facilitate the commission of the violations of Title 21 as charged in the indictment.

Pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney